

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO. 20210928 INP000264 – D
DATE OF NOTICE: SEPTEMBER 28, 2021
DATE RESPONSE DUE: OCTOBER 28, 2021

The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

PRETREATMENT – MODIFICATION

AQUESTIVE THERAPEUTICS, INC. fka MONOSOL RX LLC, Permit No. INP000264, PORTER COUNTY, 6560 Melton Rd., Portage, IN. This industrial pretreatment modification reflects a change in frequency testing for CBOD5, COD, and Phosphorus from once daily to twice monthly. Permit Manager: Ms. Megan Miller, 317/233-1854. mmiller@idem.in.gov. Posted online at <https://www.in.gov/idem/public-notices/>.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Notices: <https://www.in.gov/idem/public-notices/>; Citizen Guide: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. Please tell others whom you think would be interested in this matter.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

September 28, 2021

VIA ELECTRONIC MAIL

Mr. Christopher Jacobson, EH&S Manager
Aquestive Therapeutics Inc. (fka Monosol Rx LLC)
6560 Melton Road
Portage, IN 46368

Dear Mr. Jacobson:

Re: IWP Permit No. INP000264
Draft Permit Modification
Aquestive Therapeutics Inc. (fka Monosol Rx LLC)
Portage, IN – Porter County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. The enclosed Pages 1 and 2 of 23 are intended to replace the corresponding pages of your existing IWP Permit No. INP000264. An accompanying Briefing Memo itemizes and explains the rationale for the revisions.

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/public-notice/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. A 30-day comment period is available to solicit input from interested parties, including the public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.

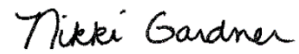
Questions concerning this draft permit modification may be addressed to Megan Miller of my staff, at 317/233-1854 or by email at mmiller@idem.in.gov.



A State that Works

Mr. Christopher Jacobson, EH&S Manager
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Sincerely,

A handwritten signature in black ink that reads "Nikki Gardner". The script is cursive and fluid.

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality

Enclosures

cc: Porter County Health Department
Don Slawnikowski, Portage POTW
Jay Hanko, IDEM
IDEM North West Regional Office
Nick Ream, IDEM

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

In accordance with 327 IAC 5-21 and IDEM's permitting authority under IC 13-15, Aquestive Therapeutics Inc. (fka Monosol Rx LLC) (hereinafter referred to as the permittee) is authorized to discharge from the facility located at 6560 Melton Road Portage, Indiana into the City of Portage Publicly Owned Treatment Works (POTW), in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on June 11, 2021, is hereby amended, as contained herein. The amended provisions shall become effective _____. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit and the authorization to discharge, as amended, shall expire at midnight February 28, 2027.

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee must submit a renewal IWP permit application to the Industrial NPDES Permit Section in the Office of Water Quality, no later than one hundred and eighty (180) days prior to the date this permit expires. Failure to do so will result in expiration of the authorization to discharge.

Signed on _____ for the Indiana Department of
Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

(A) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(1) During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Outfall 001 is located at a manhole in front of the building. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>		<u>Measurement Frequency</u> [3]	<u>Sample Type</u> [4]
Flow [5]	Report	Report	MGD	1 X Daily	24-Hr. Total
Acetone	6.3[7]	2.5[7]	mg/l	2 X Monthly	Grab
n-Amyl acetate	6.3[7]	2.5[7]	mg/l	2 X Monthly	Grab
Ethyl acetate	6.3[7]	2.5[7]	mg/l	2 X Monthly	Grab
Isopropyl acetate	6.3[7]	2.5[7]	mg/l	2 X Monthly	Grab
Methylene chloride	0.92[7]	0.21[7]	mg/l	2 X Monthly	Grab
CBOD ₅	1000[8]	-----	mg/l	2 X Monthly	24-Hr. Total
COD	1350[8]	-----	mg/l	2 X Monthly	24-Hr. Total
Phosphorus	10[8]	-----	mg/l	2 X Monthly	24-Hr. Total

Table 2

<u>Parameter</u>	<u>Quality or Concentration</u>			<u>Monitoring Requirements</u>	
	<u>Daily Minimum</u>	<u>Daily Maximum</u>	<u>Units</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH [6]	5.5[8]	9.5[8]	s.u.	1 X Daily	Grab

- [1] Outfall 001 shall be designated as the combined wastestreams at the point of discharge to the POTW.
- [2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.
- [3] In situations of intermittent or batch discharge, all parameters required to be monitored should be sampled during the first representative discharge occurring during the monitoring period and then reported on the appropriate state and federal forms at the end of the monitoring period.



Industrial Wastewater Pretreatment (IWP)

**Briefing Memo for
Aquestive Therapeutics Inc. (fka Monosol Rx LLC)
Draft modification: September 2021**

Indiana Department of Environmental Management

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	Aquestive Therapeutics Inc. (fka Monosol Rx LLC) 6560 Melton Road Portage, IN, 46368
Existing Permit Information:	Permit Number: INP000264 Expiration Date: February 28, 2027
Facility Contact:	Christopher Jacobson, EH&S Manager (219) 307-2360, cjacobson@aquestive.com
Facility Location:	6560 Melton Road Portage, IN 46368 Porter County
Receiving POTW:	Portage Utilities Services 2301 Hamstrom Road Portage, IN, 46368 NPDES Permit # IN0024368
Proposed Permit Action:	Modify
Source Category	Industrial Pretreatment
Permit Writer:	Megan Miller, Environmental Manager (317)233-1854, mmiller@idem.in.gov

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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from Aquestive Therapeutics Inc. (fka Monosol Rx LLC) on August 19, 2021 to modify Industrial Wastewater Pretreatment (IWP) Permit INP000264. The current five year permit was issued with an effective date of March 1, 2022 in accordance with 327 IAC 5-2-6(a).

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.56, as well as Indiana Administrative Code (IAC) 327 Article 5, development of a Statement of Basis, or Briefing Memo, is required for NPDES permits. This document fulfills the requirements established in those regulations.

This Briefing Memo identifies the basis for this modification to the permit and the modified pages of the permit issued on June 11, 2021.

2.0 PERMIT MODIFICATION

2.1 Modification Request

The facility has requested for the measurement frequency for CBOD₅, COD, and Phosphorus be changed from 1 X Daily to 2 X Monthly due to infrequent discharge and low test levels.

2.2 IDEM's Proposed Modification

The inspector and POTW contact have both agreed that this facility does not need to test for CBOD₅, COD, and Phosphorus on a daily basis. The measurement frequency will be changed to 2 X Monthly as requested. Pages 1 and 2 of 23 of the permit will be updated.

3.0 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/public-notices/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. A 30-day comment period is available to solicit input from interested parties, including the public.